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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

LESLIE KLEIN,

) Case No. 2:23-bk-10990-SK

) Chapter 11

) **THE DEBTOR'S JOINDER TO CHAPTER**
) **11 TRUSTEE'S RESPONSE TO**
) **THE MOTION FOR RELIEF FROM THE**
) **AUTOMATIC STAY UNDER 11 U.S.C. § 362**

) **Date: August 9, 2023**
) **Time: 8:30 a.m.**
) **Place: Courtroom 1575**

Leslie Klein (the "**Debtor**"), the debtor herein, joins in and supports Bradley D. Sharp ("Trustee"), the chapter 11 trustee of the Debtor response (the "**Response**") [Docket No. 196] to the Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 [Docket No. 84] (the "**Motion**") filed by the Co-Trustee of the Franklin Menlo Trust (the "**Movant**").

The Debtor has just recently substituted in new experienced bankruptcy counsel (July 24, 2023), and based upon the Trustee's Response and the need for new counsel to the Debtor to have adequate time to evaluate the Motion, the Debtor also requests that the Court continue this matter,

1 for new counsel to better evaluate the Motion, and allow the Debtor to make an adequate response
2 to the Motion.

3 The Motion should be continued to a date to be determined to permit new counsel to gather
4 sufficient information to allow him to make an informed decision with respect to the Menlo
5 litigation and ultimately the Motion. The Menlo trust matters are also being litigated in State
6 Court, and counsel has been informed that the State Court may be entering orders that are void
7 (See, In re Schwartz, 954 F2d. 569 (9th Cir. 1992) as the automatic stay has not yet been lifted and
8 the State Court is still issuing decisions postpetition which impacts the Motion before this Court.
9

10 For the reasons stated the Motion should be continued to enable the Debtor a reasonable
11 time to fully evaluate the Motion.
12

13
14 DATED: July 26, 2023

KOGAN LAW FIRM, APC
Michael S. Kogan

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16 By: /s/ Michael S. Kogan
17 Michael S. Kogan
18 Attorneys for the Debtor
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In re: LESLIE KLEIN Debtor(s). Bradley Sharp v Kenneth Klein and Shrifa Klein	CHAPTER: 11 CASE NUMBER: 2:23-bk-10990-SK Adv. No. 2:23-ap-01167-SK
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NOTE: When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category I. Proposed orders do not generate an NEF because only orders that have been entered are placed on the CM/ECF docket.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 11500 W. Olympic Blvd., Suite 400, Los Angeles, California 90064

A true and correct copy of the foregoing document described as **THE DEBTOR'S JOINDER TO CHAPTER 11 TRUSTEE'S RESPONSE TO THE MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 26, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

☒ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):

On **July 26, 2023**, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____ I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

July 26, 2023
Date

Pamela Lynn
Type Name

/s/Pamela Lynn
Signature

In re: LESLIE KLEIN Debtor(s). Bradley Sharp v Kenneth Klein and Shrifa Klein	CHAPTER: 11 CASE NUMBER: 2:23-bk-10990-SK Adv. No. 2:23-ap-01167-SK
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ADDITIONAL SERVICE INFORMATION (if needed):

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II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL - VIA U.S. MAIL

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